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February 16, 2024

Via ECF

The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Morales, et al. v. Performance Master, Inc. et al.*
Civil Docket No.: 21-cv-00097-ER

Dear Judge Subramanian:

Our office represents Defendants J.D.M. Marmol & Granite and Marcos Zhiminaicela in the above-referenced matter. This letter is submitted to respectfully request a [one-week extension to February 23, 2024, to submit Defendants' Reply.](#)

The basis for this request is that the undersigned is leaving the firm and new counsel is being assigned to the matter. Further, Plaintiffs did not provide the exhibits for their opposition at any time prior in discovery but only upon submitting their opposition to summary judgment to which we require additional time to review and discuss the same with Defendants.

We kindly thank Your Honor for your consideration of this request.

Very truly yours,

/s/ Matthew Madzellan
Matthew Madzellan, Esq.

SO ORDERED.

Arun Subramanian, U.S.D.J.
Date: February 16, 2024